

EXHIBIT 3

EXHIBIT E

Debtors' Search Protocol for Second Day Hearing Discovery

Chris Grubb: (June 27, 2024- November 6, 2024) and **David Orlofsky:**¹ (July 29, 2024 - November 6, 2024)

("Franchise Group" OR "FRG" OR "Fusion") ~~AND~~ w/25 ("DIP" w/1025 ("2L" or "Second Lien" OR "2nd Lien"))

("Franchise Group" OR "FRG" OR "Fusion") ~~AND~~ w/25 ("DIP" w/1025 ("HoldCo" OR "hold co" OR "Holdings" OR "Freedom"))

("Franchise Group" OR "FRG" OR "Fusion") w/25 ("DIP Budget" OR ("DIP" w/1025 "budget") OR ~~"cash flow" OR "projections" OR "13 week" OR "13 wk"~~)

~~("Franchise Group" OR "FRG" OR "Fusion") w/25 ("DIP" OR "financing" OR "facility" OR "restructuring" OR "out of court" OR "out of court" "post petition" OR "post petition" OR "cash collateral" OR RSA)~~

~~("Franchise Group" OR "FRG" OR "Fusion") AND ([search string with relevant domain names of negotiating parties and their advisors])~~

*all searches exclude solely internal communications

Laurence: September 27, 2024 ~~January 1, 2022~~- November 6, 2024

~~"DIP" OR "financing" OR "facility" OR "restructuring" or "out of court" OR "out of court" OR "post petition" or "post petition" OR "cash collateral" OR "RSA"~~

~~Fusion~~

~~"DIP budget" OR ("DIP" w/25 "budget") OR "cash flow" or "projections" OR "13 week" or "13 wk"~~

~~"DIP" w/25 ("HoldCo" OR "hold co" OR "Holdings" OR "Freedom")~~

~~"DIP" w/25 ("2L" OR "Second Lien" OR "2nd Lien")~~

~~A search string to get all communications with the negotiating parties by search for those domain names. For example: (@paulhastings.com OR lazard.com OR [Domain names of the DIP Lenders] OR [Domain names of the ABL Lenders and their advisors])~~

¹ Searches of Mr. Orlofsky's emails remain in progress, Debtors reserve all rights.